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COUNTY OF SACRAMENTO, SACRAMENTO COUNTY SHERIFF'S DEPARTMENT, SCOTT JONES, DYLAN BLACK, SHEA LUKES, and DARIO BARRON

*Exempt from Filing Fees Pursuant to Government Code § 6103*

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Attorneys for Plaintiff SALVADOR GARCIA, JR.

UNITED STATES DISTRICT COURT,  
EASTERN DISTRICT OF CALIFORNIA

SALVADOR GARCIA, JR.,

CASE NO. 2:23-CV-00899-DAD-CSK

Plaintiff,

**STIPULATION AND [PROPOSED] ORDER  
FOR DISMISSAL**

v.

COUNTY OF SACRAMENTO,  
SACRAMENTO COUNTY SHERIFF'S  
DEPARTMENT, SCOTT JONES, DOE 1,  
and DOE 2,

SAC Filed: 08/06/2024

FAC Filed: 12/08/2023

Complaint Filed: 05/12/2023

Defendants.

1 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff SALVADOR  
2 GARCIA, JR and Defendants COUNTY OF SACRAMENTO, SACRAMENTO COUNTY SHERIFF'S  
3 DEPARTMENT, SCOTT JONES, DYLAN BLACK, SHEA LUKES, and DARIO BARRON, by and  
4 through their counsel of record that this action be dismissed, with prejudice, pursuant to Rule 41(a)(1) of  
5 the Federal Rules of Civil Procedure, with each party to bear its own attorney fees and costs.

6  
7 **IT IS SO STIPULATED.**

8  
9 Dated: December 26, 2024

PORTER SCOTT  
A PROFESSIONAL CORPORATION

10  
11 By /s/Carl L. Fessenden  
12 Carl L. Fessenden  
13 Matthew R. Mendoza  
14 Attorneys for Defendants

15  
16 Dated: December 26, 2024

LAW OFFICE OF MARK E. MERIN

17 By /s/Paul Masuhara (Authorized on 12/23/24)  
18 Mark E. Merin  
19 Paul Masuhara  
20 Attorneys for Plaintiff

21 **[PROPOSED] ORDER**

22  
23 **IT IS SO ORDERED.**

24  
25 Dated: \_\_\_\_\_

26 \_\_\_\_\_  
27 United States District Court Judge  
28 Eastern District of California